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July 30, 2019

VIA ECF

The Honorable Carol Bagley Amon
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: London v. Elkann (Index No. 19-cv-03275)

Your Honor:

We are counsel to Travis London. As reflected in the Complaint, as well as in Docket Entry # 6, defendant Lapo Edovard Elkann currently resides in Milan, Italy. In the weeks following our filing of this lawsuit, there was discussion with Mr. Elkann's anticipated U.S. counsel for this matter about the prospect of their accepting service on Mr. Elkann's behalf in lieu of having to serve him through Article 5 of the Hague Convention. We were just recently advised that Mr. Elkann's counsel will not be authorized to accept service. Accordingly, we are about to retain an appropriate process server who is capable of handling all Hague Convention requirements. Our likely process server advises that the estimated turnaround time is three (3) to four (4) months from the date that the documents arrive in Italy.

Based on the foregoing, please consider this letter a formal request for an extension of time, pursuant to Federal Rule of Civil Procedures 4(f) and 4(m), from August 31, 2019 to at least November 30, 2019, to serve Mr. Elkann pursuant to Article 5 of the Hague Convention. In considering this request, it should be noted that 4(f), which governs service in a foreign country (including through the Hague Convention), does not proscribe a time limit for service. See, e.g., Morgan v. Virgin Atlantic Airways, 2015 WL 7283182, *3-4 (N.D.N.Y. November 17, 2015). Alternately, it is respectfully requested that the Court direct an alternate means of service to expedite service, either via Mr. Elkann's U.S. counsel, or through a means in Italy other than via the Hague Convention.

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Thank you in advance for your attention to this request.

Very Truly Yours,

/s/

Paul S. Haberman (PH 2771)

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